

# **EXHIBIT A**

Brian H. Rubenstein  
Tel 215.988.7800  
Fax 215.988.7801  
rubensteinb@gtlaw.com

August 17, 2021

The Honorable Thomas I. Vanaskie  
Special Master for Discovery  
Stevens & Lee  
1818 Market Street, 29th Floor  
Philadelphia, PA 19103

Re: *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation*,  
U.S. District Court for the District of New Jersey; Case No. 1:19-md-02875-RBK-JS

Dear Judge Vanaskie:

Pursuant to paragraph 20 of the Confidentiality and Protective Order (D.N. 139), Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis LLC, Actavis Pharma, Inc., and Arrow Pharm (Malta) Ltd.<sup>1</sup> (collectively, “the Teva Defendants”), hereby notify Your Honor that certain documents designated “CONFIDENTIAL” and “RESTRICTED CONFIDENTIAL” by the Teva Defendants have been challenged by Plaintiffs’ counsel and said dispute cannot be resolved by agreement.

The parties have met and conferred in accordance with the procedure set forth in paragraph 20(a) of the Protective Order, and have significantly narrowed the documents in dispute. Out of 126 documents identified in Plaintiffs’ initial correspondence, the parties have agreed to either de-designate or withdraw the challenge as to all but 26 documents. The Teva Defendants therefore request the Court’s guidance on whether to present this dispute at the upcoming Case Management Conference on August 25, 2021, or at another time which is convenient for Your Honor.

---

<sup>1</sup> Undersigned counsel notes that Arrow Pharm (Malta) Ltd. has not been served, and no longer exists as a separate legal entity. This production does not represent Arrow Pharm (Malta) Ltd. or any successor in interest’s consent to jurisdiction in this or any underlying matter, and Arrow Pharm (Malta) Ltd. and its successor in interest specifically reserve the right to raise any and all defenses, jurisdictional or otherwise.

The Honorable Thomas I. Vanaskie  
August 17, 2021  
Page 2

Please feel free to contact me if you have any questions or concerns, and thank you for your time and attention to this matter.

Respectfully,

/s/ Brian H. Rubenstein  
Brian H. Rubenstein, Esq.  
*Attorney for Teva Pharmaceuticals USA,  
Inc., Teva Pharmaceutical Industries Ltd.,  
Actavis LLC, and Actavis Pharma, Inc.*

cc: DECValsartan@btlaw.com  
valpec@kirtlandpackard.com